

CNH's Opposition to Plaintiffs'  
Motion to Compel Further Interrogatory Responses

Exhibit 3

Declaration of Uj ctqp'Uej cghgt (Aug. 5, 2013)

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JACK REESE, FRANCES ELAINE  
PIDDE, JAMES CICHANOFSKY,  
ROGER MILLER, and GEORGE  
NOWLIN,

Plaintiffs,

v.

CNH GLOBAL N.V. and CNH  
AMERICA LLC,

Defendants.

Case 2:04-cv-70592-PJD-PJK

Hon. Patrick J. Duggan, U.S.D.J.

Hon. Paul J. Komives, U.S. Mag. J.

**DECLARATION OF SHARON SCHAEFFER**

I, Sharon Schaeffer, hereby declare as follows:

1. I am a manager of retirement plans for CNH America LLC and, therefore, familiar with the company's pension records regarding the plaintiff class in this case.

2. Members of the plaintiff class in this case worked for Case Corporation (prior to July 1, 1994) and CNH America (after July 1, 1994). CNH America is responsible for the pension of a class member related to his or her post-July 1, 1994 work. An entity not controlled by CNH America or CNH Global N.V., is responsible for the class members' frozen pre-July 1, 1994 pensions.

3. CNH America does not have in an electronically accessible format the amount a class member receives for his or her pre-July 1, 1994 work or the total of his or her pre- and post-July 1, 1994 pensions.

4. If CNH America wanted to ascertain the amount a class member receives for his or her pre-July 1, 1994 work or the total of his or her pre- and post-July 1, 1994 pensions, it would have to review the pension and benefit files for that class member. Moreover, CNH America is not in a position to confirm that the pension information in its files concerning the pre-July 1, 1994 period is currently accurate, because certain adjustments may have been made in the last two decades.

Pursuant to 28 U.S.C. § 1746 (2006), I declare under penalty of perjury that the foregoing is true and correct. Executed on August 5, 2013.

Sharon Schaeffer  
Sharon Schaeffer